

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA)
)
 v.) No. 3:19-CR- 176
)
 SAMUEL ALLEN-RAGIN,) Count 1: 18 U.S.C. § 922(g)(1)
) (Possession of Firearm by Convicted
 Defendant.) Felon)
)
) Count 2: 21 U.S.C. §§ 841(a)(1) and
) (b)(1)(C) (Possession with Intent to
) Distribute Cocaine and Cocaine Base)
)
) Forfeiture Notice
)

INDICTMENT

DECEMBER 2019 TERM – At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Possession of Firearm by Convicted Felon)

On or about December 23, 2018, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, SAMUEL ALLEN-RAGIN, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Glock 40 caliber semi-automatic pistol, model 23, bearing serial number BCSN929, which had been shipped and transported in interstate and foreign commerce.
(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT TWO

(Possession with Intent to Distribute Cocaine and Cocaine Base)

On or about December 23, 2018, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, SAMUEL ALLEN-RAGIN, did knowingly, intentionally, and unlawfully possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack," a schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).)

FORFEITURE ALLEGATION

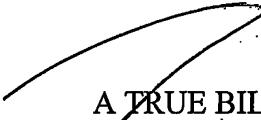
Pursuant to Rule 32.2 Fed. R. Crim. P., the defendant is hereby notified that upon conviction of the offense charged in Count 1 of this Indictment, the defendant shall forfeit to the United States any firearm or ammunition involved in or used in any knowing violation of the offense charged.

The defendant is further notified that upon conviction of the offense charged in Count 2 of this Indictment, the defendant shall forfeit any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

Property subject to forfeiture includes, but is not limited to:

- a Glock 40 caliber semi-automatic pistol, model 23, bearing serial number BCSN929;
- any accompanying ammunition; and
- \$789 in U.S. Currency seized on or about December 23, 2018.

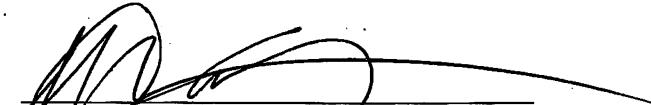
(In accordance with Title 18, United States Code, Section 924(d); incorporated by Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853.)


A TRUE BILL:


FOREPERSON

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By: 

Stephen E. Anthony
Special Assistant United States Attorney

Holli R. Wood
Holli R. Wood
Special Assistant United States Attorney